

From: [Sivak, Michael](#)
To: [Mitchell, Tanya](#); [Carpenter, Angela](#)
Subject: RE: Rolling Knolls approach to NJDEP comments
Date: Monday, June 15, 2015 11:36:00 AM

Tanya,

Sorry for the delay in responding to this. Please see my comments below:

Michael Sivak
212.637.4310

From: Mitchell, Tanya
Sent: Wednesday, June 10, 2015 11:58 AM
To: Sivak, Michael; Carpenter, Angela
Subject: Rolling Knolls approach to NJDEP comments

Hello All,

NJDEP has recently become involved in the Rolling Knolls site again. However, it is a completely new team with no detailed background or history of past actions at the site. It also appears that they have not read some of the most recent and important documents. Thus, EPA management's decision to move this project forward while proposing to collect additional samples in pre-design is causing some concern with this approach. The immediate concerns are:

1. How to apply NJ impact to GW numbers. Angela you are copied because I believe we had this discussion a few years (2008?) back with the state and the PRPs. It is my understanding that NJ IGW are not risked based and are not used for delineation (EPA use ARARs). NJ IGWs will be considered when we look at remediation numbers.

Recommend: I recommend we continue to apply the NJ IGW numbers as I previously stated.

Michael: I agree that we should not be delineating nature and extent using IGW numbers. We can compare data to IGW numbers in the RI to see if there are exceedances – and use GW data to provide another line of evidence as to whether there may be sources of GW contamination present – but NJ IGW numbers, which are TBCs, should not be used to delineate in the RI.

2. The state would like to collect samples from ~35 locations at 6" intervals in vadose zone and the saturated zones.

Recommend: I recommend that we pass the request on to the PRPs and let the state and PRPs come to some resolution in the middle. The state is willing to reduce the number of locations if needed. Granted this approach will push out the BERA sampling significantly, maybe 4-6 months.

Michael: Interesting. If our eco folks agree that the data we are collecting fully characterizes the eco habitat, why is the state pushing for 0 – 6 and 6 – 12 inches? I would suggest that in order to keep the project moving, we move forward with the data we have, and when we do further delineation sampling in the RD, we can collect 0 – 6 and 6 – 12 inch samples.

Based on my first review of the NJDEP comments, I believe these are the most critical that require management input on how to proceed. Once I forward the comments on to the PRP, you may receive a call. This is not exactly how we outlined the approach forward.

Your comments are requested.

Thanks,
Tanya